

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
---	-----------------------

This document relates to:

O'Neill, et al. v. The Republic of Iraq, No. 1:04-cv-01076 (GBD) (SN)

**MOTION TO SUBSTITUTE PARTIES PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 15(d)**

Pursuant to Federal Rules of Civil Procedure 15(d), Plaintiffs herein move the Court to allow substitution of the party as identified on Exhibit A in the above referenced action. The individual being substituted into the case is the Personal Representative of an individual killed as a result of the terrorist attacks on September 11, 2001 (a “9/11 decedent”) or is the Personal Representative for a family member of a 9/11 decedent.

Exhibit A identifies the individuals to be substituted in the pleading, including the capacity in which they seek to be substituted, state of residency at the time the complaint was filed, the existing pleading that refers to the plaintiff, and the decedent of which the plaintiff is the Personal Representative.

Plaintiffs propose that, upon endorsement of Plaintiffs’ Proposed Order, the substituted parties be individually entered as a Plaintiff into the Court’s ECF system to ease the burden on the Clerk of the Court’s Office and the size of this MDL.

Dated: July 6, 2022

/s/ Jerry S. Goldman

Jerry S. Goldman, Esq.

Bruce E. Strong, Esq.

Alexander Greene, Esq.

ANDERSON KILL P.C.

1251 Avenue of the Americas

New York, NY 10020

Tel: (212) 278-1000

Fax: (212) 278-1733

Email: jgoldman@andersonkill.com

bstrong@andersonkill.com

agreene@andersonkill.com

EXHIBIT A to O'Neill Motion to Substitute Parties

	Previous Personal Representative or Claimant:	Case Number:	Substitute Personal Representative:	State of Residency of Substituted Personal Representative at Filing:	9/11 Decedent's Name:
1.	Dorothy O'Neill	1:04-cv-01076	Christine O'Neill, as Personal Representative of the Estate of Dorothy O'Neill, deceased, the late parent of John P. O'Neill, Sr.	NJ	John P. O'Neill, Sr.
2.	Christine O'Neill and John P. O'Neill, Jr., as the co-Personal Representatives of the Estate of John P. O'Neill, Sr., deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of John P. O'Neill, Sr.	1:04-cv-01076	Christine O'Neill, as the Personal Representative of the Estate of John P. O'Neill, Sr., deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of John P. O'Neill, Sr.	NJ	John P. O'Neill, Sr.
3.	Karen Pabon and Gia L. Morris-Kern, as the co-Personal Representatives of the Estate of Israel Pabon, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Israel Pabon	1:04-cv-01076	Karen Pabon, as the Personal Representative of the Estate of Israel Pabon deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Israel Pabon	NJ	Israel Pabon

4.	John Doe 123, as Personal Representative of the Estate of Renee Baldwin, deceased, the late sibling of Cecelia E. Richard	1:04-cv-01076	Robert Lawson, as Personal Representative of the Estate of Renee Baldwin, deceased, the late sibling of Cecelia E. Richard	MD	Cecelia E. Richard
5.	John Doe 104, as Personal Representative of the Estate of Yvette Mell, deceased, the late parent of Matthew Barnes	1:04-cv-01076	Russell Barnes and Daniel Barnes, as co-Personal Representatives of the Estate of Yvette Mell, deceased, the late parent of Matthew Barnes	NY & FL	Matthew Barnes